

# **EXHIBIT C**

## Selness, Ryan

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**From:** Selness, Ryan  
**Sent:** Friday, June 03, 2016 2:00 PM  
**To:** malioto@tstp.com; lauren russell@tstp.com; 'grushing@saveri.com'  
**Cc:** Sweeney, Dianne L.  
**Subject:** Cathode Ray Tube Antitrust Litigation - Stipulation to Terminate Forwarding Obligation

Mario, Lauren, and Geoff,

We have reviewed your proposal, which is to limit Pillsbury's forwarding obligation to those papers related to upcoming default proceedings your clients intend to pursue against the Irico entities. Respectfully, we decline.

As you are aware, Pillsbury withdrew from this case six years ago. As we have discussed with you, none of the Pillsbury lawyers who worked on the matter are still with the firm.

While the Court ordered us to continue forwarding papers as a transitional matter, that was not under the rubric of an ongoing attorney-client representation of the Irico entities by Pillsbury. Rather, the Court granted our motion to withdraw as counsel of record on June 24, 2010.

It seems unlikely that—more than six years after the termination of an attorney-client relationship—the Court would conclude that the forwarding obligation under Local Rule 11, which appears to be designed to aid in the smooth transition to new counsel, would somehow trump the usual service obligations and/or constitute actual service on a former client.

In any case, given the passage of time and the termination of our attorney-client relationship many years ago, this is not something we can agree to. As we have no relationship with the Irico entities (except for the forwarding obligation imposed by the Court), we have no information as to whether the Irico entities would consent to your proposal. As discussed, we will provide you and the Court with the contact information we have and, otherwise we must leave this issue to the Court for resolution.

We appreciate your willingness to meet and confer on this matter. If, upon further review, your clients have a change of position, please let us know by Thursday, June 10, 2016.

Regards,

Ryan Selness

**Ryan Selness** | Associate  
Pillsbury Winthrop Shaw Pittman LLP  
2550 Hanover Street | Palo Alto, CA 94304-1115  
t 650.233.4006 | f 650.233.4545 | m 408.892.6453  
ryan.selness@pillsburylaw.com | website bio

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